

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA EX
REL. CORI RIGSBY AND KERRY RIGSBY**

RELATORS

VERSUS

CIVIL ACTION NO. 1:06CV00433-LTS-RHW

**STATE FARM INSURANCE COMPANY,
ALLSTATE INSURANCE COMPANY,
USAA INSURANCE COMPANY,
FORENSIC ANALYSIS & ENGINEERING CORPORATION,
EXPONENT FAILURE ANALYSIS,
HAAG ENGINEERING CO.,
JADE ENGINEERING,
RIMKUS CONSULTING COMPANY INC.,
and STRUCTURES GROUP**

DEFENDANTS

**MOTION TO EXTEND EXPERT DESIGNATION DEADLINE OF FORENSIC
ANALYSIS & ENGINEERING CORPORATION¹**

COMES NOW Forensic Analysis & Engineering Corporation (“Forensic”) by and through its attorney of record, Robert D. Gholson, and files this its Motion to Extend Expert Designation Deadline of Forensic Analysis & Engineering Corporation. Said motion is based on the facts as set out below:

I. ARGUMENT

On February 11, 2010, counsel for Forensic filed its Motion to be Relieved as Attorney for Forensic. In that Motion, it was requested that counsel for Forensic be relieved in this matter and that Forensic be granted additional time to obtain new counsel and/or respond to discovery deadlines. A Notice of Hearing on the aforementioned Motion to Withdraw was filed on February 23, 2010, setting a hearing on the aforementioned Motion to Withdraw for February 25,

¹ Due to the nature and brevity of the issue before the Court a Memorandum Brief is not being submitted with this Motion. However, should the Court require such a Memorandum one will be submitted.

2010. The Hearing on the Motion to Withdraw as Attorney for Forensic was thereafter held on February 25, 2010. As of today's date, no further Order has issued from the Court regarding the Motion to Withdraw. On December 22, 2009, this Court fixed today's date, March 2, 2010, as the deadline by which Forensic should designate its Expert Witnesses. An extension of this deadline is reasonably necessary.

II. CONCLUSION

Due to facts as set forth above and in the Motion and Memorandum Brief in Support of Motion to Withdraw as Attorney, which is incorporated fully herein, the Court should grant the Motion for Extension of Expert Designation Deadline for a period of thirty (30) days or pending a determination of the pending Motion to Withdraw as Attorney.

This the 2nd day of March, 2010.

Respectfully submitted,

BY: **s/Robert D. Gholson**

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CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2010, I electronically filed the foregoing with the clerk of the Court using the ECF system, which sent notification of such filing to the following:

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**PRESIDENT OF FORENSIC ANALYSIS & ENGINEERING
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